

US BANK/FCC MAY 14 2009

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Shareholders of Delavan Telephone Company)
Transferors)
)
Rural Communications Holding Corporation)
Transferee)
)
For Transfer of Control of Delavan Telephone Company, which)
Provides Interstate Telecommunications Services in Minnesota)
Pursuant to a Domestic Blanket Authorization under Section 214)
of the Communications Act)

TO: Chief, Wireline Competition Bureau

**APPLICATION FOR NON-STREAMLINED CONSENT
TO TRANSFER OF CONTROL OF
DOMESTIC BLANKET SECTION 214 AUTHORIZATION**

The Shareholders of Delavan Telephone Company ("Transferors") and Rural Communications Holding Corporation ("RCHC"; FRN: 0016920506) hereby request Commission authorization for the transfer of control of Delavan Telephone Company ("Delavan"; FRN: 0003773686) and its blanket domestic Section 214 authorization from the current shareholders of Delavan to RCHC.

Delavan, a Minnesota corporation, provides local exchange telephone services (including interstate exchange access) as an incumbent local exchange carrier ("ILEC") in one exchange serving the area in and around the community of Delavan (2007 population: 209) in Faribault and Blue Earth Counties in rural south central Minnesota.

RCHC, a Minnesota corporation, is a holding company that directly or indirectly owns the following five incumbent local exchange carriers ("ILECs") that provide local exchange telephone services (including interstate exchange access) and resold interstate

toll services in thirteen rural local exchanges in southern Minnesota: (1) Blue Earth Valley Telephone Company; (2) Minnesota Lake Telephone Company¹; (3) Easton Telephone Company; (4) Eckles Telephone Company; and (5) Cannon Valley Telecom, Inc.²

Delavan is presently a closely-held corporation whose stock is owned entirely by the Parish family. The proposed transaction will be accomplished by the acquisition of 100 percent of the common stock (the only class of stock) of Delavan by RCHC from Edward R. Parish, his wife Patricia A. Parish and the Anne M. Parish Irrevocable Trust established for their daughter Anne M. Parrish. At the completion of the transaction, Delavan will be a 100 percent-owned subsidiary of RCHC. Control of Delavan will give RCHC control of Delavan's blanket domestic Section 214 authorization.

The Delavan exchange is adjacent to exchanges owned by two RCHC subsidiaries, the Easton Telephone Company and Blue Earth Valley Telephone Company. Therefore, this application does not qualify for streamlined treatment under Section 63.03 of the Commission's Rules.

¹ Minnesota Lake Telephone Company is a direct subsidiary of Blue Earth Valley Telephone Company, which in turn is a subsidiary of RCHC.

² Cannon Valley Telecom, Inc. is a direct subsidiary of Cannon Valley Communications, Inc., which in turn is a subsidiary of RCHC.

In accordance with the requirements of Section 63.04(a) of the Commission's Rules, the applicants submit the following information:

(1) Name, address and telephone number of each applicant:

Transferors:

Shareholders of Delavan Telephone Company
105 Second Street East (P.O. Box 128)
Delavan, Minnesota 56023
Telephone: (507) 854-3221
Facsimile: (507) 854-3225

Transferee:

Rural Communications Holding Corporation
123 West 7th Street
Blue Earth, Minnesota 56013
Telephone: (507) 526-3252
Facsimile: (507) 526-4597

(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized:

Delavan is a corporation organized under the laws of the State of Minnesota.

RCHC is a corporation organized under the laws of the State of Minnesota.

(3) Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:

For Transferor:

Edward R. Parish, President
Delavan Telephone Company
105 Second Street East (P.O. Box 128)
Delavan, Minnesota 56023
Telephone: (507) 854-3221
Facsimile: (507) 854-3225

With a copy to Counsel:

Gerard J. Duffy
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, N.W. (Suite 300)
Washington, D.C. 20037
Telephone: (202) 659-0830
Facsimile: (202) 828-5568

For Transferee:

William V. Eckles, President
Rural Communications Holding Corporation
123 West 7th Street
Blue Earth, Minnesota 56013
Telephone: (507) 526-3252
Facsimile: (507) 526-4597

With a copy to Counsel:

Gerard J. Duffy
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, N.W. (Suite 300)
Washington, D.C. 20037
Telephone: (202) 659-0830
Facsimile: (202) 828-5568

- (4) **Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:**

Delavan Telephone Company - Prior to Proposed Transaction:

The names, addresses, citizenship and principal businesses of the only entities that own at least ten (10) percent of the equity and voting power of Delavan Telephone Company prior to the proposed transaction are:

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Edward R. Parish. 105 Second Street East Delavan, MN 56023	34.31%	U.S.A.	Telecommunications
Patricia A. Parish. 105 Second Street East Delavan, MN 56023	33.33%	U.S.A.	Telecommunications
Anne M. Parish Irrevocable Trust (Robert L. Parish & Peter J. Gillen, Trustees) 105 Second Street East Delavan, MN 56023	32.36%	MN Trust	Telecommunications

Edward R. Parish and Patricia A. Parish are husband and wife. Anne M. Parish is the daughter of Edward R. Parish and Patricia A. Parish. Anne M. Parish, Robert L. Parish and Peter J. Gillen are all United States citizens.

No other individual or entity directly or indirectly owns or controls ten (10) percent or more of the voting or equity interests of Delavan Telephone Company prior to the proposed transaction.

Delavan Telephone Company - After Proposed Transaction:

The name, address, citizenship and principal business of the only entity that will own at least ten (10) percent of the equity of Delavan Telephone Company after the proposed transaction is:

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Rural Communications Holding Corporation 123 West 7 th Street Blue Earth, MN 56013	100.00%	MN Corp.	Telecommunications

Rural Communications Holding Corporation ("RCHC")

The name, address, citizenship and principal business of the only entity that will own at least ten (10) percent of the equity of RCHC both before and after the proposed transaction is:

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Blue Earth Valley Communications, Inc. 123 West 7 th Street Blue Earth, MN 56013	100.00%	MN Corp.	Telecommunications

Blue Earth Valley Communications, Inc. ("BEVCOMM")

The names, addresses, citizenship and principal businesses of the entities that own at least ten (10) percent of the equity of Blue Earth Valley Communications, Inc. ("BEVCOMM") both before and after the proposed transaction are:

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
Neil and Sue Eckles 123 West 7 th Street Blue Earth, MN 56013	22.41%	U.S.A.	Telecommunications
Gail Eckles 123 West 7 th Street Blue Earth, MN 56013	24.66%	U.S.A.	Telecommunications

<u>Name & Address</u>	<u>% Voting & Equity</u>	<u>Citizenship</u>	<u>Principal Business</u>
William V. Eckles 123 West 7 th Street Blue Earth, MN 56013	19.84%	U.S.A.	Telecommunications
Eckles Dynasty Trust #1 123 West 7 th Street Blue Earth, MN 56013	16.55%	MN Trust	Investments

The trustee of the Eckles Dynasty Trust #1 is William V. Eckles, and the beneficiaries are William V. Eckles and his issue. The trustee and beneficiaries are all United States citizens.

Eckles Dynasty Trust #2 123 West 7 th Street Blue Earth, MN 56013	16.55%	MN Trust	Investments
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The trustee of the Eckles Dynasty Trust #2 is William V. Eckles, and the beneficiaries are William V. Eckles and his issue. The trustee and beneficiaries are all United States citizens.

No other individual or entity will directly or indirectly own or control at least ten (10) percent of the equity of Delavan or RCHC or BEVCOMM after the proposed transaction.

(5) Certification pursuant to 47 C.F.R. §§1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Delavan and RCHC hereby certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the transaction:

The proposed transaction entails the transfer of control of Delavan from its three existing Parish family stockholders to RCHC. The transaction will be accomplished by the sale of 100 percent of the common stock of Delavan (its only class of stock) to RCHC. When the transaction is completed, all of the issued and outstanding common stock of Delavan will be owned by RCHC, and Delavan will be a wholly-owned subsidiary of RCHC. Control of Delavan will give RCHC control of the Delavan's blanket domestic Section 214 authorization.

(7) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

A map showing the Minnesota local exchange service areas of Delavan and RCHC's ILEC subsidiaries is attached.

Areas and Services of Delavan and affiliates

Delavan, a Minnesota corporation, provides local exchange services (including interstate interexchange access) as an ILEC in the Delavan exchange in Faribault and Blue Earth Counties in rural south central Minnesota. Delavan's local exchange services include a variety of calling features, including caller ID, call forwarding, call waiting, three-way calling, automatic recall, automatic call back, distinctive ringing, selective call acceptance and rejection, speed dialing, toll restriction and voice mail. Delavan's exchange serves approximately 246 access lines.

Delavan also provides dial-up and high-speed Internet access services

Delavan holds a non-controlling 20.00 percent limited partnership interest in LCDW Wireless Limited Partnership, a Minnesota limited partnership that holds the license for Advanced Wireless Service Station WQGL810 in the Minnesota 10 Rural Service Area (Le Sueur, MN).

Delavan has no ownership interests in any other entities that offer domestic telecommunications services.

Areas and Services of RCHC and Affiliates

RCHC owns 100 percent of the following three rural ILECs: (1) Blue Earth Valley Telephone Company, a Minnesota corporation, which provides local exchange telephone services within the Blue Earth, Elmore, Guckeen, Huntley, Wells and Winnebago exchanges in Faribault County in south central Minnesota and Kossuth County, Iowa; (2) Easton Telephone Company, a Minnesota corporation, which provides local exchange telephone services within the Easton exchange in Faribault County in south central Minnesota; and (3) Eckles Telephone Company, a Minnesota corporation, which provides local exchange telephone services within the New Prague exchange in Scott and LeSueur Counties in south central Minnesota.

In addition, Blue Earth Valley Telephone Company owns 100 percent of Minnesota Lake Telephone Company, a Minnesota corporation, which serves the Minnesota Lake exchange in Faribault, Waseca and Blue Earth Counties in south central Minnesota.

RCHC owns 100 percent of Cannon Valley Communications, Inc. ("CVCI"), a Minnesota corporation, which in turn owns 100 percent of Cannon Valley Telecom, Inc. ("CVT"). CVT provides local exchange telephone services (including interstate exchange access) as an ILEC in the Bricelyn (Faribault County), Freeborn (Freeborn County), Frost (Faribault County) and Morristown (Rice County) exchanges in rural south central Minnesota and Iowa.

In the aggregate, RCHC's five direct and indirect ILEC subsidiaries provide local exchange telephone service (including interstate exchange access) to approximately 12,400 access lines. The local exchange service offerings of RCHC's direct and indirect ILEC subsidiaries include a variety of calling features, such as caller ID, call forwarding, call waiting, three-way calling, automatic recall, automatic call back, distinctive ringing, selective call acceptance and rejection, speed dialing, toll restriction and voice mail.

RCHC subsidiaries and affiliates provide resold interstate, intrastate and international toll services; dial-up and high-speed Internet access services; computer networking services; alarm and surveillance services; business telephone systems; and telephone answering services to residents and businesses in and around the thirteen exchanges.

RCHC subsidiaries provide digital cable television services in the New Prague and Minnesota Lake exchange areas.

RCHC holds a non-controlling 20.00 percent limited partnership interest in LCDW Wireless Limited Partnership ("LCDW"), a Minnesota limited partnership that holds the license for Advanced Wireless Service Station WQGL810 in the Minnesota 10 Rural Service Area (Le Sueur, MN). Even when RCHC's and Delavan's limited partnership interests in LCDW are combined, they will remain non-controlling. However, because certain previously reported equity changes and the current transaction will result in 50 percent or more of the equity interests in LCDW having changed hands since LCDW first acquired the Station WQGL810 license, an application for *pro forma* transfer of control of LCDW is being filed out of an abundance of caution (see Item (9) below).

Cannon Valley Cablevision, Inc. ("CVCV"), a wholly-owned subsidiary of CVCI, provides cable television services in Bricelyn, Kiester, Frost, Morristown, Warsaw, Coates, Empire, Hampton, Marshan, Nininger, Randolph, Ravenna, Stanton and Vermillion, Minnesota. CVCV also provides high-speed cable modem Internet access in Kiester, Minnesota, and in portions of Dakota County, Minnesota.

BEVCOMM and its subsidiaries holds an aggregate 10.00 percent membership interest in West Central Transport Group, a Minnesota limited liability company that provides high-capacity special access circuits in Minnesota, North Dakota and South Dakota.

BEVCOMM and its subsidiaries hold an aggregated 100.00 percent membership interest in South Central Transport, LLC, a Minnesota limited liability company that provides telecommunications transport facilities and services in Minnesota.

BEVCOMM and its subsidiaries hold an aggregated 66.66 percent membership interest in Tri-Central Transport Group a Minnesota limited liability company that provides telecommunications transport facilities and services in Minnesota and other portions of the upper Midwest.

BEVCOMM and its subsidiaries hold an aggregated 11.70 percent ownership interest in Broadband Visions, LLC, a Minnesota limited liability corporation that delivers digital television signals to video program distributors from a headend located in Hutchinson, Minnesota.

BEVCOMM holds a 33.33 percent ownership interest in Hector Communications Corporation, a holding company which provides telecommunications services through various subsidiaries in rural portions of Minnesota, Wisconsin and North Dakota. Hector owns the following nine ILECs that provide local exchange services to 28 rural exchanges in Minnesota, Wisconsin and North Dakota: (1) Arrowhead Communications Corp. ("Arrowhead"); (2) Eagle Valley Telephone Company ("Eagle Valley"); (3) Felton Telephone Company ("Felton"); (4) Granada Telephone Company ("Granada"); (5) Hager Telecom, Inc. ("Hager"); (6) Indianhead Telephone Company ("Indianhead"); (7) Loretel Systems, Inc. ("Loretel"); (8) Pine Island Telephone Company ("Pine Island"); and (9) Sleepy Eye Telephone Company ("Sleepy Eye"). These ILEC subsidiaries also resell long distance toll services to approximately 15,700 Minnesota, Wisconsin and North Dakota customers. The ILEC subsidiaries and other Hector subsidiaries also provide cable television service, digital television service over broadband facilities, dial-up Internet access, and high-speed Internet access over digital subscriber lines (DSL). Hector itself provides dial-up and high-speed Internet access services to residents and businesses in the communities of Hector and Buffalo Lake in south central Minnesota.

Arrowhead, a Minnesota corporation, is a wholly-owned Hector subsidiary which provides local exchange services and long distance toll services in and around the communities of Bena and Cotton in northeastern Minnesota. Arrowhead also provides dial-up and high-speed Internet access services, and business telephone systems to Bena and Cotton area residents and businesses.

Eagle Valley, a Minnesota corporation, is a wholly-owned Hector subsidiary which provides local exchange services and long distance toll services in and around the community of Clarissa in central Minnesota. Eagle Valley also provides dial-up and high-speed Internet access services, and business telephone systems to Clarissa area residents and businesses.

Granada, a Minnesota corporation, is a wholly-owned Hector subsidiary which provides local exchange services and long distance toll services in and around the community of Granada in south central Minnesota. Granada also provides dial-up and high-speed Internet access services, and business telephone systems to Granada area residents and businesses.

Indianhead, a Wisconsin corporation, is a wholly-owned Hector subsidiary which provides local exchange services and long distance toll services in and around the communities of Exeland, Radisson and Weyerhaeuser in northwestern Wisconsin. Indianhead also provides dial-up and high-speed Internet access services to Exeland, Radisson and Weyerhaeuser area residents and businesses.

Pine Island, a Minnesota corporation, is owned by Hector (69.0 percent) and by Hector's wholly owned subsidiary Indianhead (31.0 percent). Pine Island provides local exchange services and long distance toll services in and around the communities of Pine Island and Oronoco in southeastern Minnesota. Pine Island also provides digital video services, dial-up and high-speed Internet access services, and business telephone systems to Pine Island and Oronoco area residents and businesses.

Alliance Telecommunications Corporation ("Alliance"), a Minnesota corporation, is a wholly-owned subsidiary of Hector that serves as an intermediate holding company which in turn owns Felton, Hager, Loretel and Sleepy Eye.

Felton, a Minnesota corporation, is a wholly-owned Alliance subsidiary which provides local exchange services and long distance toll services in and around the communities of Felton, Averill, Hitterdal and Borup in northwestern Minnesota. Felton also provides dial-up and high-speed Internet access services to Felton, Averill, Hitterdal and Borup area residents and businesses.

Hager, a Wisconsin corporation, is a wholly-owned Alliance subsidiary which provides local exchange services and long distance toll services in and around the communities of Hager City and Bay City in southwestern Wisconsin. Hager also provides dial-up and high-speed Internet access services to Hager City and Bay City area residents and businesses.

Loretel, a Minnesota corporation, is a wholly-owned Alliance subsidiary which provides local exchange services and long distance toll services in and around the communities of Ada, Audubon, Cormorant, Frazee, Glyndon, Hendrum/Perley, Lake Park and Pelican Rapids in northwestern Minnesota, including a few cross-border extensions into North Dakota. Loretel provides dial-up and high-speed Internet access services to Ada, Audubon, Cormorant, Frazee, Glyndon, Hendrum/Perley, Lake Park and Pelican Rapids area residents and businesses. Loretel serves as an agent for Unicell wireless phone packages and for Keypage paging services. Finally, Loretel provides cable television services in Ada, Cormorant, Glyndon, Hendrum, Pelican Rapids, Borup, Felton, Ulen, Hitterdal, Climax, Fisher, Halstad, Shelly,

Fertile, Gary, Hawley, Mahnomen, Prairie Lake, Pelican Lake and Lake Ida in northwestern Minnesota.

Sleepy Eye, a Minnesota corporation, is a wholly-owned Alliance subsidiary which provides local exchange services and long distance toll services in and around the communities of Sleepy Eye, Hanska, Goodhue, Bellechester, White Rock and Mazeppa in south central and southeastern Minnesota. Sleepy Eye provides digital video service, dial-up and high-speed Internet access services, and business telephone systems to Sleepy Eye, Hanska, Goodhue, Bellechester, White Rock and Mazeppa area residents and businesses. Finally, Sleepy Eye owns Halstad Engineering Company, a Minnesota corporation, which formerly provided engineering services (the business has been sold to Finley Engineering), and OU Connection, Inc., a Minnesota corporation, which has been authorized by the Minnesota Public Utilities Commission to provide competitive local exchange services but which has not commenced operations.

Mustang Communications Corporation ("Mustang"), a Minnesota corporation, is a wholly-owned subsidiary of Hector that holds an International Section 214 authorization for global resale of switched services (File No. ITC-214-20050713-00253, granted effective August 5, 2005). However, Mustang left the toll resale business prior to 2007, and has subsequently been involved only in the lease of non-regulated fiber and associated facilities for use by an educational network in west central Minnesota.

Indianhead Communications Company ("Indianhead Communications"), a Wisconsin corporation, is a wholly-owned subsidiary of Hector that holds an International Section 214 authorization for global resale of switched services (File No. ITC-97-583, granted effective November 14, 1997) and that resells international call termination services throughout the Wisconsin areas served by Hector's ILEC subsidiaries.

Cannon Communications Corporation ("CCC"), a Minnesota corporation, is a wholly-owned subsidiary of Alliance that provides dial-up and high-speed Internet access services in Red Wing, Minnesota, and nearby portions of western Wisconsin.

Loretel holds an 18.09 percent ownership interest in VAL-ED Joint Venture, LLP dba 702 Communications ("702 Communications"), a Minnesota limited liability partnership that provides competitive local exchange services, long distance toll services, Internet access and other data services in and around Morehead, Dilworth and Breckenridge, Minnesota; and Fargo, West Fargo and Wahpeton, North Dakota.

Granada holds a 5.0 percent ownership interest in West Central Transport Group ("WCTG"), which provides high-capacity special access circuits in Minnesota, North Dakota and South Dakota.

Loretel and Arrowhead Communications hold an aggregated 20.00 percent ownership interest in Northern Transport Group, LLC, a Minnesota limited liability corporation that provides high-capacity special access circuits in Minnesota.

Loretel holds a 5.26 percent ownership interest in Northwest Minnesota Special Access, LLC ("NMSA"), a Minnesota limited liability corporation which provides data and video services to schools and libraries in Minnesota.

Hector's ILEC subsidiaries hold an aggregated 8.49 percent ownership interest in Independent Pinnacle Services, LLC, a Minnesota limited liability corporation that provides directory services to over 150 telephone companies in fifteen states.

Hector and Alliance hold an aggregated 16.38 percent ownership interest in Broadband Visions, LLC, a Minnesota limited liability corporation that delivers digital television signals to video program distributors from a headend located in Hutchinson, Minnesota.

Indianhead and CCC hold an aggregated 6.45 percent ownership interest in Consolidated Management Group, Inc., a Wisconsin corporation that provides high-capacity special access circuits in Wisconsin.

RCHC and BEVCOMM and their subsidiaries and affiliates have no ownership interests in any other entities that offer domestic telecommunications services.

(8) Statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:

Because Delavan's exchange is adjacent to the Easton exchange of RCHC's subsidiary Easton Telephone Company and the Winnebago exchange of RCHC's subsidiary Blue Earth Valley Telephone Company, the Application does not fit within the presumptive streamlined categories in Section 63.03(b) of the Commission's Rules, and streamlined treatment is not requested.

However, while not claiming streamlined treatment, the parties note that the proposed transaction will not have an adverse impact upon the Commission's competition and antitrust policies. Both before and after completion of the proposed transaction, RCHC and Delavan and their affiliated companies will have a market share of less than ten percent (10.0%) of the interstate, interexchange market. RCHC's current ILEC subsidiaries (approximately 12,400 access lines) and Delavan (approximately 246 access lines) are incumbent independent local exchange carriers that have, in combination, far fewer than two percent (2.0%) of the nation's subscriber lines installed in the aggregate nationwide. Finally, RCHC will be taking control of the existing telephone exchange and exchange access services provided by Delavan, and has no affiliated telecommunications carrier that provides competitive local exchange services or exchange access services within the Minnesota service area of Delavan,

while Delavan does not provide competitive local exchange services or exchange access services within the Minnesota, Wisconsin or North Dakota service areas of the telecommunications carriers presently affiliated with RCHC.

(9) Identification of all other Commission applications related to the same transaction:

In connection with the proposed transaction, an application is being filed for the *pro forma* transfer of control of LCDW Wireless Limited Partnership, the licensee of Advanced Wireless Service Station WQGL810.

(10) Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

No party to the transaction is facing imminent business failure at this time. Therefore, the applicants are not requesting special consideration because a party to the transaction is facing imminent business failure.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction:

No separately filed waivers or waiver requests are being sought in conjunction with the proposed transaction.

(12) Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:

The proposed transaction entails the transfer of control of Delavan from Delavan's existing shareholders to RCHC, an established rural telephone holding company that has long owned ILEC subsidiaries that serve similar rural communities in Minnesota. RCHC and Delavan both have proven records of investing in their rural networks and communities, and of providing high-quality, state-of-the-art voice, data and video services at affordable rates to their rural service areas. The proposed transaction will ensure that the rural Minnesota customers of Delavan will continue to receive high-quality, state-of-the-art voice, data and video services at affordable rates for the foreseeable future.

Conclusion

In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the transfer of control of the domestic blanket Section 214 authorization held by Delavan to RCHC.

Delavan and RCHC reiterate that they certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

EDWARD R. PARISH

Signature: Edward R. Parish

Date: 04/27/09

**RURAL COMMUNICATIONS
HOLDING CORPORATION**

Printed Name: _____

Title: _____

Date: _____

PATRICIA A. PARISH

Signature: Patricia A. Parish

Date: 4-27-09

Anne M. Parish Irrevocable Trust

By: Robert Parish

Robert Parish

Trustee

Date: 4-18-2009

By: Peter J. Gillen

Peter J. Gillen

Trustee

Date: 19 Apr 09

Conclusion

In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the transfer of control of the domestic blanket Section 214 authorization held by Delavan to RCHC.

Delavan and RCHC reiterate that they certify, pursuant to 47 C.F.R. §§1.2001 through 1.2003, that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

EDWARD R. PARISH

Signature: _____

Date: _____

**RURAL COMMUNICATIONS
HOLDING CORPORATION**

Printed Name: WILLIAM E. PARISH

Title: CEO

Date: 5-8-07



PATRICIA A. PARISH

Signature: _____

Date: _____

Anne M. Parish Irrevocable Trust

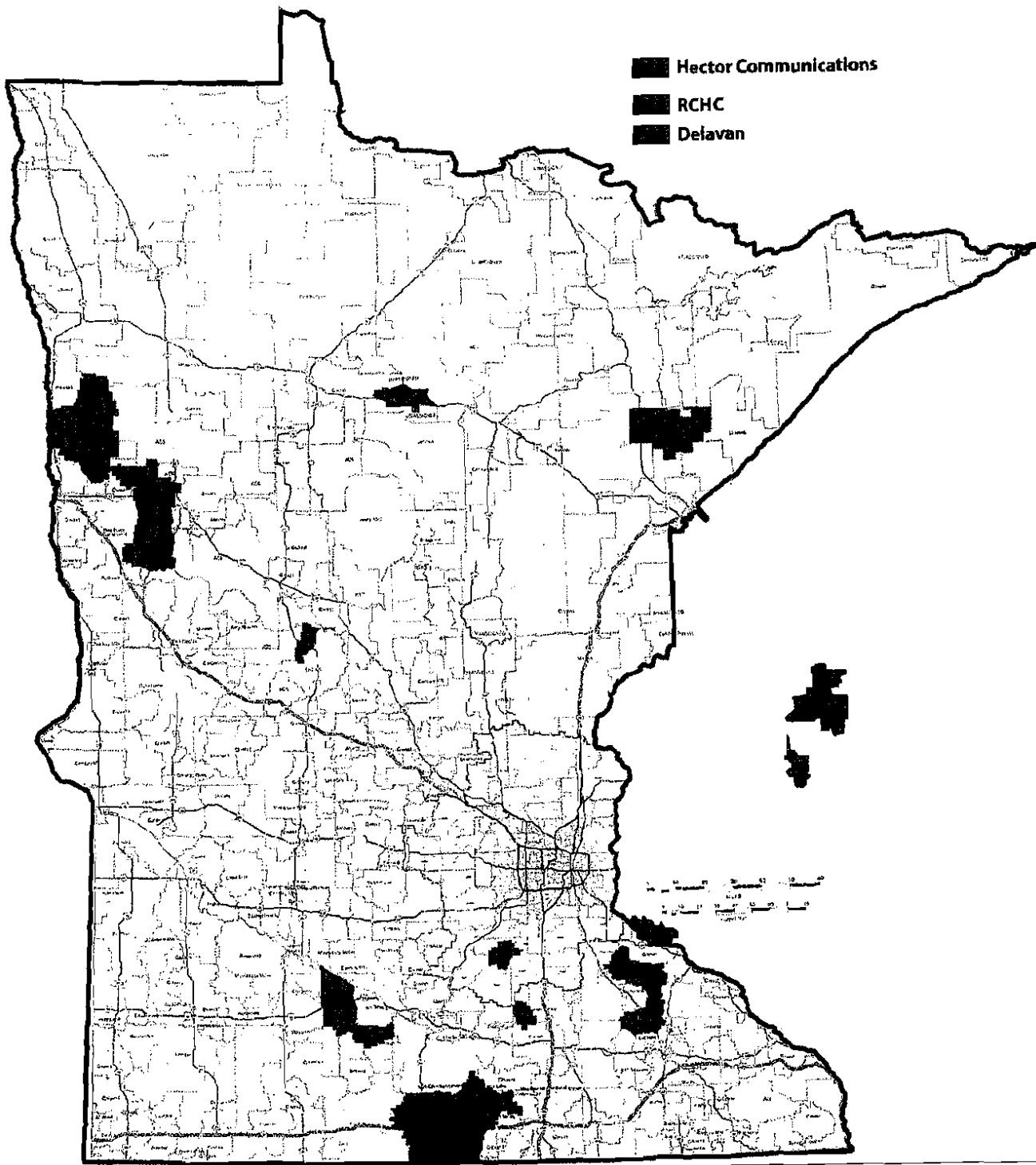
By: _____, Trustee
Robert Parish

Date: _____

By: _____, Trustee
Peter J. Gillen

Date: _____

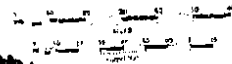
EXHIBIT A



Hector Communications

RCHC

Delavan



READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

US BANK/FCC MAY 14 2009
FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

Approved by OMB
3050-0589
Page 1 of 1

(1) LOCKBOX # 979091		SPECIAL USE ONLY FCC USE ONLY	
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Rural Communications Holding Corporation		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$1,015.00	
(4) STREET ADDRESS LINE NO. 1 123 W 7th Street			
(5) STREET ADDRESS LINE NO. 2			
(6) CITY Blue Earth		(7) STATE MN	(8) ZIP CODE 56013
(9) DAYTIME TELEPHONE NUMBER (include area code) (507) 526-3252		(10) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) 0016920506		(12) FCC USE ONLY	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME Rural Communications Holding Corporation			
(14) STREET ADDRESS LINE NO. 1 123 W 7th Street			
(15) STREET ADDRESS LINE NO. 2			
(16) CITY Blue Earth		(17) STATE MN	(18) ZIP CODE 56013
(19) DAYTIME TELEPHONE NUMBER (include area code) (507) 526-3252		(20) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) 0016920506		(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE CUT	(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$1,015.00	(27A) TOTAL FEE \$1,015.00	FCC USE ONLY	
(28A) FCC CODE 1		(29A) FCC CODE 2	
(23b) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	FCC USE ONLY	
(28B) FCC CODE 1		(29B) FCC CODE 2	
SECTION D - CERTIFICATION			
CERTIFICATION STATEMENT			
I, _____, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.			
SIGNATURE _____		DATE _____	
SECTION E - CREDIT CARD PAYMENT INFORMATION			
MASTERCARD _____ VISA _____ AMEX _____ DISCOVER _____			
ACCOUNT NUMBER _____		EXPIRATION DATE _____	
I hereby authorize the FCC to charge my credit card for the service(s) authorization herein described.			
SIGNATURE _____		DATE _____	

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

FEBRUARY 2003 (REVISED)